

# Exhibit A

## RE: Erdman v. Victor-Documents

From Jeffrey M. Eilender <jeilender@schlamstone.com>

To tyler@erdman.it

CC Emilio Rodriguez<erodriguez@polizzotto.com>, Michael Brodlieb<mbrodlieb@schlamstone.com>, adamvictor@tgds.com

Date Monday, August 22nd, 2022 at 3:26 PM

We have a charging lien on all Adam Victor documents in our possession and courts have held ad nauseum that a charging lien may not be circumvented by a subpoena. Thus, we will not be producing any documents and if we are subpoenaed we will be moving to quash it and moving for sanctions. Do not communicate with me again.



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**From:** Tyler Erdman <tyler@erdman.it>

**Sent:** Monday, August 22, 2022 5:16 PM

**To:** Jeffrey M. Eilender <jeilender@schlamstone.com>

**Cc:** Emilio Rodriguez<erodriguez@polizzotto.com>; Michael Brodlieb <mbrodlieb@schlamstone.com>

**Subject:** Erdman v. Victor-Documents

Mr. Eilender,

I hope you have been doing well. I wanted to touch base regarding an order issued in the Erdman v. Victor federal action.

As you may already be aware, Judge Gorenstein issued a July 26th, 2022 order that Mr. Victor is produce documents in his custody and control, including those Victor stated are in your firm's possession. I attached a copy of that order.

Mr. Rodriguez stated in the attached letter that your firm has developed an "adversarial relationship" with Mr. Victor, and that you "were not expected to just hand over the requested documents". As such he could not estimate a timeframe as to when your would be able to produce the documents.

Those documents were due to be produced last week and I was wondering if Mr. Rodriguez or Mr. Victor has been able to reach out to regarding them.

In either event, does your firm have any issues providing documents to Mr. Victor due to an "adversarial relationship" or monies owed by him?

If you do believe that there may be an issue producing them to Victor, would you have any objections to a subpoena for such documents?

Assuming that you are willing to provide documents, would you expect a significant amount of time to be required to turn documents over to Mr. Victor?

Our current discovery cutoff is September 22nd. I would like to let the Court know if we are going to require an extension and about alert them to any other potential issues as soon as possible.

Thanks for your time,

Tyler Erdman  
917-301-0401

